

1 David Morris Clayman / דוד משה קלימן / אָדָם דָוד קָלִיְימָן, *Pro se*

2 FILED BY AO D.C.

3
4 IN THE UNITED STATES DISTRICT COURT
5 FOR THE SOUTHERN DISTRICT OF FLORIDA

SEP 10 2025
ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S.D. OF FLA. W.D.B.

6 David Morris Clayman (/ אָדָם דָוד קָלִיְימָן),
7 Plaintiff,

8 vs.

9 UNITED STATES OF AMERICA
10 et. al.

CASE NO. 9:25-CV-80890-WM

PLAINTIFF'S MOTION TO PROTECT
SACRED NAMES OF G-D IN CASE
FILES FROM NONRELIGIOUS
DESTRUCTION

12 PLAINTIFF'S MOTION TO PROTECT THE SACRED NAMES OF G-D IN
13 COURT FILINGS AND RECORDS

15 Plaintiff, appearing pro se, respectfully moves this Court for an Order protecting and preserving
16 the sanctity of the Names of G-d that appear in printed filings, exhibits, and related court records
17 generated in this action, and as grounds therefore states:

19 I. INTRODUCTION

21 In bringing this case before the Court, Plaintiff was required to submit excerpts of religious texts
22 to make his full case most convincingly, including portions of the Talmud, that necessarily
23 contain the sacred Names of G-d ("Shaimos"). Plaintiff made every reasonable effort to minimize
24 the inclusion of these Names in pleadings. Nevertheless, certain occurrences appear in Plaintiff's
25 Original Complaint, First Amended Complaint, and Second Amended Complaint, which have
26 been filed with the Court and, in the case of the Original Complaint, served on Defendants via

1 sacred hard copy.

2
3 Additionally, despite Plaintiff's specific request that the Government avoid reproducing these
4 Names, the U.S. Attorney and Assistant U.S. Attorney have included the sacred Names of G-d in
5 their filings, and further copies may exist in transcripts or other case materials. At present, there
6 is no established convention for abbreviation or respectful substitution of the Names of G-d in
7 federal filings, nor any plan for religiously appropriate handling of such documents during or
8 after the pendency of this case.
9

10 **II. RELIGIOUS SIGNIFICANCE AND NEED FOR ACCOMMODATION**

11
12 According to Jewish custom, law, and practice, printed documents containing the Names of G-d
13 require special handling and ultimately must be deposited in a genizah (a repository for sacred
14 texts) or buried in a Jewish cemetery. Routine disposal or destruction—such as shredding—is a
15 profound desecration and is religiously forbidden. Plaintiff, as a matter of sincerely held religious
16 belief, has a duty to ensure that these documents are preserved and interred properly.
17

18 This request does not extend to electronic case files or digital copies, which, under Jewish custom
19 and law, do not require such treatment. The issue is confined exclusively to physical paper copies
20 in the possession of the Court and the Defendants.
21

22 **III. BUT-FOR CAUSATION AND PLAINTIFF'S RELIGIOUS RESPONSIBILITY**

23
24 The sacred Names of G-d at issue would not have been printed but for Plaintiff's decision and
25 effort to bring this action in federal court. The Court's filing requirements necessitated that
26 Plaintiff include certain source texts in order to fully and accurately present his claims. Those
27 filings, once served, created a stream of Shaimos that extends to Defendants' files, the Court's
28

1 files, and transcripts or copies in the hands of the U.S. Attorney's Office.
2

3 Plaintiff acknowledges that by initiating this action, he bears a religious responsibility to ensure
4 that the resulting Shaimos is handled in a manner consistent with Jewish custom and law. This
5 Motion seeks to discharge that responsibility in a respectful and orderly way, without placing
6 undue administrative burdens on the Court or Defendants.
7

8 **IV. IDENTIFICATION OF SHAIMOS PAGES**
9

10 Plaintiff provides below a listing of pages where sacred Names of G-d appear, based on his best
11 review of filed documents to date. Plaintiff reserves the right to supplement this list as discovery
12 and filings proceed. These page numbers match the Court's page numbering and electronic docket
13 entry numbers are provided for convenient cross-reference.
14

- 15 • **Original Complaint (DE 1):** [p. 58, p. 60, p. 61, p. 62]
- 16 • **Cover Letter Sent to Defendants with Original Complaint Hard Copies ("Actually
17 Protecting The National Motto – "In G-d We Trust""") (No Docket Entry):** [p. 2]
- 18 • **First Amended Complaint (DE 19):** [p. 46, p. 48, p. 49, p. 50]
- 19 • **Appendix (Second Amended Complaint) to Motion for Leave to File Second
20 Amended Complaint (DE 35):** [p. 87, p. 89, p. 90, p. 91]
- 21 • **Defendant's Motion to Dismiss (DE 13):** [p. 1 - 7]
- 22 • **Defendant's Motion to Dismiss Amended Complaint (DE 27):** [p. 1 - 7]
- 23 • **Plaintiff's Response in Opposition to Defendant's Motion to Deem Plaintiff a
24 Vexatious Litigant and Enjoin Further Filings (DE 16):** [p. 20]
- 25 • **Plaintiff's Request for Extension of Time and Fallback Response to Motion to Deem
26 Plaintiff Vexatious (DE 36):** [p. 8, p. 9, p. 16] (three mistakes by Plaintiff)

1 • Appendix to Plaintiff's Request for Extension of Time and Fallback Response to
2

3 **Motion to Deem Plaintiff Vexatious (DE 36): [p. 1] (a mistake by Plaintiff)**

4 This section is provided to aid the Court and Defendants in identifying the relevant pages for
5 purposes of notice, retention, and eventual disposition.

6

7

8 **V. COURT POLICY ON SHREDDING AND INSUFFICIENCY UNDER JEWISH**
9 **CUSTOM AND LAW**

10

11 When Plaintiff last visited the Clerk's Office at the U.S. Courthouse in West Palm Beach, the
12 Clerk informed Plaintiff that hard copies filed in this Court are retained for approximately one
13 year and then shredded. Plaintiff respectfully emphasizes that **shredding is not an acceptable**
14 **option under Jewish custom and law for Shaimos.** Shredding constitutes destruction and
15 desecration of sacred Names of G-d.

16

17 Accordingly, absent Court intervention, the ordinary retention-and-shredding policy would result
18 in an unavoidable and profound religious violation. This Motion therefore seeks a narrowly
19 tailored accommodation to ensure compliance both with Court policies and with Plaintiff's
20 religious obligations.

21

22 **VI. TRANSCRIPTION OF ORAL USE OF THE NAME**

23

24 Plaintiff further requests that when he speaks the Name of G-d aloud in oral argument, testimony,
25 or any proceeding before this Court, official transcripts should render the Name in an abbreviated
26 or hyphenated form (for example, "G-d" in "In G-d We Trust" or "In G We Trust"), rather than
27

1 fully spelling it out.
2

3 This limited accommodation will prevent additional instances of Shaimos from being generated
4 through transcription practices, while preserving the accuracy of the record for all substantive
5 purposes.
6

7 **VII. REQUESTED RELIEF**
8

9 Plaintiff respectfully requests that this Court enter an Order providing that:
10

11 1. **Hold on Paper Copies.** The Court and Defendants may retain paper copies of filings
12 containing the Names of G-d for as long as necessary for the pendency of this case, including any
13 appeals.
14

15 2. **Notice of Disposal.** Before any destruction, shredding, or disposal of case files or
16 Defendants' copies that contain such Names, Plaintiff shall be given reasonable advance written
17 notice.
18

19 3. **Opportunity to Retrieve.** Upon notice, Plaintiff shall have the opportunity either to
20 retrieve such documents directly (if local to South Florida) or to receive them by mail (if great
21 distance beyond 80 kilometers from Plaintiff's residential ZIP code so requires), for the sole
22 purpose of placing them in a genizah or arranging for burial in accordance with Jewish custom
23 and law.
24

25 4. **Respectful Courtesy in Future Filings.** The Government and Defendants should, to the
26 extent practicable, avoid reproducing the Names of G-d unnecessarily in future filings, whether
27 by abbreviation, hyphenation, or other convention.
28

29 5. **Confidential Pages with Work Product.** If any page containing the sacred Names of G-d
30 is also marked with confidential attorney-client privileged material or attorney work product, and
31

1 thus cannot be returned to Plaintiff, the U.S. Attorney or Defendants must certify to this Court,
2 under penalty of perjury, that such page has been disposed of in accordance with Jewish Shaimos
3 practices—specifically by deposit in a genizah or by religious burial in a Jewish cemetery.
4

5 **6. Transcription Practices.** The Court should instruct its official court reporters, and
6 request Defendants to instruct their transcription services, to render any spoken references (by the
7 Plaintiff, at minimum) to the Name of G-d in abbreviated or hyphenated form (e.g., “G-d”) rather
8 than fully spelling out the Name.
9

10 **7. Enforcement.** The Court shall reserve authority to hold parties in contempt should they
11 recklessly or deliberately disregard this accommodation and dispose of sacred texts as of the date
12 of this Motion being filed without affording Plaintiff the opportunity to provide religiously
13 required treatment.
14

VII. CONCLUSION

16 This Motion seeks modest relief: to protect the sanctity of a limited number of sacred Names of
17 G-d already appearing in the case file, while imposing no burden on electronic records or
18 ordinary case administration. Granting this relief would respect Plaintiff's sincerely held religious
19 obligations and prevent unnecessary desecration, consistent with the spirit of the Religious
20 Freedom Restoration Act and the Court's broad discretion to manage its own records with
21 sensitivity to litigants' religious concerns.
22

23 **WHEREFORE,** Plaintiff respectfully requests that the Court grant this Motion and enter the
24 proposed protections for the Names of G-d appearing in printed filings, transcripts, and case
25 materials.
26



1
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8

9 **CERTIFICATE OF SERVICE**

10 I HEREBY CERTIFY that on this Monday, the 8th day of September, 2025, I mailed a copy of this
11 document to the Court via certified mail and electronically served a copy of this response to the opposing
counsel on the case.



12 _____
13 /s/ *David M. Clayman*
14 Pro Se Plaintiff

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CERTIFIED MAIL



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Retail



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9589 0710 5270 2652 1263 26

Clerk of Courts
US District Court for Southern District FL
701 Clematis Street, Room 202
West Palm Beach, FL 33401

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